



**MURIEL GOODE-TRUFANT**  
*Corporation Counsel*

**THE CITY OF NEW YORK**  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

**JACQUELYN A. DAINOW**  
*Assistant Corporation Counsel*  
Phone: (212) 356-0896  
Email: jadainow@law.nyc.gov

March 24, 2025

VIA ECF

Hon. Naomi Reice Buchwald  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Morgan *et al.* v. City of New York, *et al.*, No. 23-cv-1079 (NRB)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel, attorney for Defendants the City of New York ("the City") and Correction Officer ("CO") Jalil Telemaque in the above-referenced matter. City Defendants respectfully request an adjournment of the April 8, 2025 conference to April 21, 2025, April 22, 2025, or a date thereafter convenient to the Court. This is City Defendants' first request for an adjournment of this date, and all parties consent to this request.

On March 18, 2025, this Court scheduled a conference for April 8, 2025 to address next steps (ECF No. 98). The reason for the requested adjournment is that the undersigned will be on trial in this Court beginning on April 7, 2025 in the matter of *Jonathan Banyan v. Sikorski et al.*, 18-CV-2765 (JGLC) (VF) before the Honorable Jennifer L. Rochon.

Accordingly, City Defendants, on consent of all parties, respectfully request that the April 8, 2025 conference be adjourned to April 21, 2025, April 22, 2025, or a date thereafter convenient to the Court.

I thank the Court for its time and consideration in this matter.

Respectfully submitted,

*Jacquelyn Dainow*

Jacquelyn A. Dainow  
*Assistant Corporation Counsel*

cc: All counsel of record (via ECF)